

1 Q. That fills in that gap.

2 A. That would do that.

3 Q. So then in February of 2002 is when you came to work  
4 for Pan Am?

5 A. That's correct. Actually, I would like to correct  
6 something at this point if I may as well.

7 Q. Feel free.

8 A. During my initial transfer and promotion to Boston,  
9 my initial position title was operating manager, and I was  
10 doing the same job. The position title was changed to  
11 manager of maintenance operations.

12 Q. Thank you for that clarification. So in 2002, you  
13 were hired by Pan American Airways?

14 A. That's correct.

15 Q. What position was that for?

16 A. Managing director.

17 Q. Managing director of any particular area of the  
18 company?

19 A. Of maintenance operations.

20 Q. How long did you hold that position?

21 A. Until April of 2002.

22 Q. And did you take on a different position in April of  
23 2002?

24 A. I did.

1 Q. What position was that?

2 A. Vice president of maintenance.

3 Q. Is that the position that you held at the time of  
4 your resignation from Pan Am?

5 A. It is.

6 Q. And do you recall when you resigned?

7 A. It would have been in approximately July of 2003.

8 Q. Now, just -- thank you for all of that information.

9 I just want to go back over some of these positions and  
10 get more detail if I could. At Trans New England Airways  
11 or Trans Northeast Airlines?

12 A. Trans New England Airlines.

13 Q. In your employment with Trans New England, did you  
14 have any involvement with aircraft engines?

15 A. Yes.

16 Q. With the maintenance of aircraft engines?

17 A. Yes.

18 Q. Did you have any involvement with the preservation  
19 or storage of aircraft engines?

20 A. No.

21 Q. At Boeing Military Airplane Company, did you have  
22 any involvement with aircraft engines?

23 A. No.

24 Q. At Marriott, did you have any involvement with

1 from memory. Can you tell me, if you remember, whether  
2 the General Maintenance Manual or any other manual with  
3 which you were familiar during your employment at Pan Am  
4 contained any information about the storage and  
5 preservation of aircraft engines?

6 A. I don't recall what manual would have that  
7 information at this time.

8 Q. Let me rephrase the question because I don't think  
9 you answered it there. I didn't ask you which manual  
10 contained such information. I'm asking you if you  
11 remember whether any manual within the Pan Apple manual  
12 system to the extent you remember contained any  
13 information about the preservation and storage of aircraft  
14 engines?

15 A. At this time, I don't recall.

16 Q. Can you describe for me to the extent you do recall  
17 the scope of your job responsibilities as the vice  
18 president of maintenance for Pan American Airways?

19 A. I was responsible for the oversight and performance  
20 of the maintenance organization.

21 Q. Do you recall what your duties and responsibilities  
22 were with respect to Pan Am's General Maintenance  
23 Manual -- strike that. Let me rephrase the question.  
24 Were any of your duties or responsibilities spelled out or

1 described anywhere in Pan Am's General Maintenance Manual?

2 A. Yes.

3 Q. Unfortunately, I don't have a copy of that here to  
4 show you today, but during the time of your employment  
5 with Pan Am, did you take exception with any of the  
6 descriptions of your responsibilities as they were  
7 described in the General Maintenance Manual?

8 A. Not sure I understand what you're asking me.

9 Q. While you were employed by Pan American Airways,  
10 were you familiar with your job responsibilities as they  
11 were described in the General Maintenance Manual?

12 A. Yes.

13 Q. And did you ever tell anybody that you took  
14 exception with or didn't feel that that description of  
15 responsibilities was accurate in any way?

16 A. I'm sorry, but I'm not sure what you mean by  
17 "accurate."

18 Q. I'll try again. If you recall, did you ever read  
19 that portion of the Pan Am General Maintenance Manual that  
20 described the duties of the vice president of maintenance?

21 A. Yes.

22 Q. And when you read that material, as best you recall,  
23 did you take exception with or have a different view in  
24 any way with what that manual said with respect to those

1 responsibilities?

2 A. I don't recall that.

3 Q. Okay. Can you summarize for me or give me your  
4 impression as you sit here today as to what your  
5 responsibilities were as the vice president of maintenance  
6 for Pan American Airways?

7 A. I was responsible for oversight and operation of the  
8 maintenance department.

9 Q. In that context, were you responsible for ensuring  
10 that the maintenance department on behalf of Pan American  
11 Airways performed its daily functions in compliance with  
12 federal regulations?

13 A. To the extent of my abilities, that would be  
14 correct.

15 Q. And also to the extent of your abilities, was it  
16 your responsibility as the vice president of maintenance  
17 to ensure that the maintenance department of Pan Am and  
18 its employees performed their tasks in compliance with the  
19 provisions of the General Maintenance Manual for Pan Am?

20 A. I'm sorry, could you repeat that?

21 Q. I'll try to simplify it. While you were vice  
22 president of maintenance at Pan Am, were you ultimately in  
23 charge of making sure everybody did their job in  
24 accordance with applicable regulations and Pan Am's manual.